

REMARKS/ARGUMENTS

Claims 7-9 and 21-27 are pending in the present application. Claims 7, 8, 21-23 and 25 have been amended herewith. Reconsideration of the pending claims is respectfully requested.

I. Claim Objections

The Examiner objected to Claims 21 and 25 due to informalities. Applicants have amended such claims in accordance with the Examiner's suggestions.

Therefore, the objection to Claims 21 and 25 has been overcome.

II. 35 U.S.C. § 103, Obviousness

Claims 7, 8 and 23-25 stand rejected under 35 U.S.C. § 103 as being unpatentable over Brisson (U.S. Patent No. 5,678,052), hereinafter "Brisson" in view of Lämmel et al. (Semi-Automatic Grammar Recovery; available July 2001), hereinafter "Lämmel" and further in view of Collier et al. (U.S. Patent No. 5,815,152), hereinafter "Collier". This rejection is respectfully traversed.

Applicants have amended the independent claims to better distinguish between the claimed graphical representations and the claimed structural, text-based representations, to further differentiate from the teachings of the cited Brisson reference. For example, Claim 7 recites "generating structural text-based representations of the identified portions of the initial graphical representation by applying the pattern mappings associated with the matching features to the identified portions of the graph-based representation". As can be seen, the generation of the structural *text-based representations* is done by applying the pattern mappings. In rejecting this aspect of Claim 7, the Examiner merely alleges that Brisson 'discloses using pattern mappings to create the RR diagram (see figure 3)'. The Examiner thus merely alleges a teaching of using pattern mappings to create a *graphical* representation. In contrast, Claim 7 recites just the opposite of what is alleged to be disclosed by Brisson. Per Claim 7 the *text-based representation is generated by applying pattern mapping*, whereas per the alleged *Brisson teachings a graphical (RR diagram) is generated using pattern mapping*.

The independent claims have also been amended to further emphasize the bi-directional conversion capability, which is partially enabled by maintaining feature properties associated with features that are mapped between graphical and text-based representations. This claimed feature advantageously allows for a converted representation to itself be converted back to its original form without loss of information (Specification page 2, next to last paragraph).

Therefore, the rejection of Claims 7, 8 and 23-25 under 35 U.S.C. § 103 has been overcome.

III. 35 U.S.C. § 103, Obviousness

Claims 21 and 22 stand rejected under 35 U.S.C. § 103 as being unpatentable over Brisson in view of Lämmel, further in view of Collier, and further in view of Official Notice. This rejection is respectfully traversed for similar reasons to those given above with respect to Claim 7.

Therefore, the rejection of Claims 21 and 22 under 35 U.S.C. § 103 has been overcome.

IV. 35 U.S.C. § 103, Obviousness

Claims 9, 26 and 27 stand rejected under 35 U.S.C. § 103 as being unpatentable over Brisson in view of Lämmel and Collier as applied above, and in further view of Nemer (U.S. Publication No. 2003/0110446). This rejection is respectfully traversed for similar reasons to those given above with respect to Claim 7.

Therefore, the rejection of Claims 9, 26 and 27 under 35 U.S.C. § 103 has been overcome.

V. Conclusion

It is respectfully urged that the subject application is patentable over the cited references and is now in condition for allowance. The Examiner is invited to call the undersigned at the below-listed telephone number if in the opinion of the Examiner such a telephone conference would expedite or aid the prosecution and examination of this application.

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Respectfully submitted,

/Wayne P. Bailey/

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